EAST BAY
MUNICIPAL UTILITY DISTRICT

February 22, 2007

Mr. Joe Karkoski
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Dr. - #200
Rancho Cordova, CA 95670-6114

Subject: Removal of Camanche Reservoir from the Clean Water Act Section 303(d) List of Impaired Waters for Copper

Dear Mr. Karkoski:

In response to the State Water Resources Control Board's (SWRCB's) December 4, 2006 *Notice of Public Solicitation of Water Quality Data and Information for 2008 Integrated Report – List of Impaired Waters and Surface Water Quality Assessment*, the East Bay Municipal Utility District (District) is submitting the following information concerning Camanche Reservoir located on the Mokelumne River. District staff has evaluated Camanche Reservoir for the feasibility of its delisting. The available data suggest that Camanche Reservoir is meeting water quality standards for copper. Therefore, the District recommends Camanche Reservoir's removal from the Clean Water Act's (CWA's) Section 303(d) List of Impaired Waters for copper.

Camanche Reservoir is located on the borders of San Joaquin, Calaveras, and Amador Counties, on the Mokelumne River (see Appendix 1). 7,622 acres of Camanche Reservoir and 28 miles of the Lower Mokelumne River from the Camanche Dam to the Delta are currently listed as impaired for copper and zinc. Camanche Reservoir was included on the 1998 303(d) List as part of the listing for the Lower Mokelumne River. However, in 2002, at the Central Valley Regional Water Quality Control Board's (CVRWQCB's) recommendation, the SWRCB started listing the two water bodies separately because, according to the CVRWQCB, "listing reservoirs separately from their associated downstream drainages is more appropriate because watershed management strategies (and associated data needs) for reservoirs can be distinctly different from management strategies for the downstream drainages." The extent of impairment at Camanche Reservoir includes the entire lake, defined as extending upstream to Pardee Dam.

The existing beneficial uses of Camanche Reservoir include: municipal and domestic supply (MUN); irrigation and stock watering (AGR); water contact recreation (REC-1); non-contact water recreation (REC-2); warm freshwater habitat (WARM); cold freshwater habitat (COLD); migration of aquatic organisms (MIGR); spawning, reproduction, and/or early development (SPWN); and wildlife habitat (WILD). Numeric and narrative water quality objectives (WQOs) have been promulgated to protect these beneficial uses. US EPA adopted the *National Toxics Rule* (NTR) on December 22, 1992, which was amended on May 4, 1995 and November 9, 1999, and the *California Toxics Rule* (CTR) on May 18, 2000, which was amended on February 13, 2001. The CTR's hardness-based numeric WQOs for the protection of freshwater aquatic life are applicable to Camanche Reservoir, since they represent the most stringent of all applicable numeric limits based on the water body's designated beneficial uses.

Resource extraction is identified as the primary source of copper input into Camanche Reservoir. Several historic copper and gold mines were operated in the watershed. Penn Mine, located near the southeastern shore of the Mokelumne River and Camanche Reservoir, operated intermittently from